

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES of AMERICA,)	Case No. 3:20CR00525
)	
Plaintiff.)	
)	JUDGE HELMICK
)	
vs.)	
)	
)	
)	MOTION TO AUTHORIZE HIRING
CLIFTON ROSS.)	OF EXPERT TO INVESTIGATE
Defendant)	AND CALCULATE CRIMINAL HISTORY

Now comes defendant, Clifton Ross by and through his undersigned CJA counsel, Attorney Merle R. Dech Jr., respectfully moves this court, pursuant to 18 U. S. C. section 3006A. for an order authorizing defense counsel to hire Shawna Sizemore , an expert in sentencing and recognized as such by this court, to complete a pretrial determination of defendant's criminal history category calculation and to investigate potential sentencing issues.

As this court is aware, there are a variety of factors that can impact and influence a federal Criminal defendant's Criminal History category which, if convicted, will have a major impact on this court's sentencing options, and the defendant's eventual sentence.

Having Ms. Sizemore's insights into the defendant's criminal history calculations will allow defendant and his counsel to make fully informed decisions about his defense.

WHEREFORE, Defendant requests that this Court issue an order allowing expenditure of CJA funds on behalf of the defendant to have Shawna Sizemore undertake a pretrial evaluation of his criminal history category and related sentencing issues

Respectfully submitted,

/s/Merle R. Dech, Jr.
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Date: January 20, 2021

CERTIFICATE OF SERVICE

This is to certify that this foregoing motion was electronically filed on January 20, 2021
and all parties served by electronic filing and/or ordinary mail.

/s/ Merle R. Dech, Jr.

Motion granted. Probation shall disclose all Bond and Presentence Reports in this matter and any matter in which Defendant has been charged/convicted in the past to Shawna Sizemore for purposes of preparation of a “pre-plea” calculation of Defendant’s sentencing guidelines. So Ordered.

s/ Jeffrey J. Helmick
United States District Judge